

2020 Consent Decree Audit – Corrective Action Plan

FINDING NO.	CITATION	UNIT(S)	FINDINGS	CORRECTIVE ACTIONS	COMPLETION PROGRESS
1	CD Appendix A, Part G.19.a	Facility	Purchasing Procedures: Facility did not have purchasing procedures that evaluate the availability of valves and valve packing that meet the requirements for Certified Low-Leaking Valve or Certified Low-Leaking Valve Packing Technology.	To work with local and corporate procurement to put in place written purchasing procedures. Update: Created document “Toledo Refinery Overall Low-E Compliance Guidelines and Procedures”.	Completed 6/15/2021
2	40 CFR 60.482-9a(f)	Various	Missed DOR Monthly Monitoring: 3 monthly monitoring events were not recorded in the database for components that were placed on DOR.	Updates made to LDAR Database to fix the scheduling issue prior to the audit. Also instituted a monthly monitoring checklist for components on DOR prior to the audit to have a double check of the LDAR Database scheduling feature.	Completed 11/19/2020
3	40CFR 60.482-7a(d)2	East Alstom Boiler	Late 1st Attempt at Repair: Failure to perform first repair attempt within 5 days for one control valve in East Alstom Boiler Unit.	As this was human error, reviewed the importance of properly communicating leaks to ensure repairs can be made on time. Increased communication between LDAR Data Administrator and LDAR Site Supervisor to provide a double check of leaks.	Completed 11/19/2020
4	40 CFR 60.486-a(c)(3)	Various	Leak Repair Records: Failure to maintain records of repair method applied for 17 components.	To comply with the new repair verification section of the 2020 Consent Decree, increased use of email for tracking and reporting repair data between LDAR staff and those making & scheduling repairs. Repair method is now almost always included in the email communication and if it is not it is being asked for prior to closing out.	Completed 11/19/2020

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5	40 CFR 60.486-a(b)(1)	West Tank Farm	DOR Leak Tag: Failure to attach a leak tag on one delay of repair valve located in the West Tank Farm (Tag 19076)	Placed a new leak tag on the valve upon discovery.	Completed 11/19/2020
Comparative Monitoring	CD Appendix A, Part K.29	Unsat Gas Plant & LPG	Comparative monitoring resulted in above threshold values in the Unsat Gas Plant (valves & pumps) and the LPG Unit (valves).	<p>Conduct a review of technicians training and knowledge of M21. LDAR Coordinator to conduct unannounced field audits and work with the LDAR site supervisor to take part in unannounced shadow monitoring for each technician. Evaluate leaking equipment field setup and leak history.</p> <p>Update: Field Setup & History for Unsat: This unit had 1 valve and 2 pump leaks in the audit. -One pump leak (tag 208235.1) was a connector which is not part of routine pump monitoring. -The other pump (tag 208228) had a leak in October (10/1/2020) of 4290 ppm, which was repaired with a follow-up reading on 10/2/2020 of 592 ppm. The routine monitoring in November (11/6/2020) was 609 ppm. -The valve (tag 122103) was scheduled to have routine monitoring with the LDAR tech in the unit on the day of the audit finding. No leaks on this valve in 2020.</p> <p>Field Setup & History for LPG: This unit had 2 valve leaks in the audit. -One valve (tag 200104) had an earlier leak on 7/23/2020 of 1198 ppm that was repaired on the same day. No other leaks in 2020. -The other valve (tag 219583) had no other leaks in 2020.</p>	Completed 6/15/2021

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				<p>Additional actions:</p> <ul style="list-style-type: none"> -LDAR contractor to rotate technician's unit assignments for each monitoring frequency (month for pumps/quarter for valves). -LDAR contractor conducted refresher M21 Field training and will conduct annually or when onboarding new hires. -BP Consent Decree training for LDAR Contractor updated to include the importance of accurate data, the importance of the daily certification that each technician signs, and the additional quality control steps like quarterly forensics and comparative monitoring that will identify anomalies. -LDAR Contractor conducted comparative monitoring on current technicians via a QA/QC process utilizing a regional specialist with no findings; will repeat this process periodically. 	

Completed by: Cameron Loth

Date: 6/15/2021